

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)

In re: CIRCUIT CITY STORES, INC., *et al.*,) Case No. 08-35653-DOT
Debtors.) (Chapter 11)
) (Jointly Administered)
)

**MOTION FOR ADMISSION
PRO HAC VICE OF MARY E. OLDEN**

Lisa Taylor Hudson (the “Movant”), a member in good standing of the Bar of the Commonwealth of Virginia, counsel at the law firm of Sands Anderson Marks & Miller, P.C., and an attorney admitted to practice before this Court, hereby moves this Court for entry of an *Order* permitting Mary E. Olden, Esquire, an attorney with McDonough Holland & Allen, PC, to appear *pro hac vice* before this Court in the referenced bankruptcy cases before the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Case”) on behalf of CSI Construction Company, who is represented by Sands Anderson Marks & Miller, P.C. as local counsel in this matter (collectively, the “CSI”) pursuant to *Local Bankruptcy Rule 2090-1(E)(2)*.

In support thereof, Movant states as follows:

1. Mary E. Olden, a non-resident of the Eastern District of Virginia, is a member in good standing of the bar of the State of California, and admitted to practice before the state court

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Local Counsel for Reverend Dwayne Funches, Individually, and as Independent Executor of the Estates of Travis Funches, Dione Funches, and Dwayne Funches, Jr., Emily Funches, Lovera S. Funches, and Shatira Funches, Individually; Monument Consulting, LLC; McAlister Square Partners, Ltd., Mansfield SEQ 287 and Debbie, Ltd.; UTC I, LLC; PrattCenter, LLC; Valley Corners Shopping Center, LLC; Cynthia Olloway, Individually and as a Special Administrator of the Estate of Cedric Coy Langston, Jr., a Deceased Minor; Vornado Gun Hill Road, LLC; CSI Construction Company; 1890 Ranch, Ltd; Amherst Industries, Inc.; Vornado Finance, LLC; New Vornado/Saddle Brook, LLC; Marlton, VF, LLC; North Plainfield VF LLC (North Plainfield, Store. No. 4133); Star Universal, L.L.C.; Alexander's of Rego Park Center, Inc.; Towson VF LLC; Green Acres Mall, LLC; VNO Mundy Street LLC; VNO Tru Dale Mabry, LLC; Vornado Caguas PR; BevCon I, LLC; North Plainfield VF LLC (North Bergen, NJ)

in California, as well as before the U.S. District Courts for the Northern and Eastern Districts of California, and the U.S. Court of Appeals for the Ninth Circuit. There are no disciplinary proceedings pending against Mary E. Olden.

2. Movant requests that this Court admit Mary E. Olden to practice before this Court for the purpose of filing pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case (and related proceedings) on behalf of the CSI in the jointly-administered Chapter 11 bankruptcy cases commenced by Circuit City Stores, Inc., *et al.* (the “Debtors”).

3. Movant and her law firm shall serve as co-counsel with Ms. Olden in the Bankruptcy Case (and related proceedings).

4. A copy of this *Motion for Admission Pro Hac Vice of Mary E. Olden* (the “*Motion*”) will be served upon all parties that are to receive service.

5. Pursuant to *Local Bankruptcy Rule 9013-1(G)*, and because there are no novel issues of law presented in this *Motion*, Movant requests waiver of the requirement that all motions be accompanied by written memoranda of law.

WHEREFORE, Movant respectfully requests that the Court enter an *Order* substantially in the form annexed hereto as **Exhibit A**, permitting Mary E. Olden to appear and be heard *pro hac vice* in association with Movant as counsel to CSI, in the Debtors’ Chapter 11 bankruptcy cases, and grant such other relief as deemed necessary and appropriate.

Dated: December 10, 2008

SANDS, ANDERSON, MARKS & MILLER, P.C.,

/s/ Lisa Taylor Hudson

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of December, 2008, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court for the Eastern District of Virginia, Richmond Division, using the CM/ECF system, which thereby caused the above to be served electronically on all registered users of the ECF system that have filed notices of appearance in this matter, and was mailed, by U.S. Mail, first class, postage prepaid, to all persons on the attached Service List.

/s/ Lisa Taylor Hudson

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COUNSEL FOR THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS

/s/ Lisa Taylor Hudson

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

**ORDER GRANTING ADMISSION
PRO HAC VICE OF MARY E. OLDEN**

Upon consideration of the *Motion for Admission Pro Hac Vice of Mary E. Olden* (the “*Motion*”), filed in the above-styled matter by Lisa Taylor Hudson, a member of the Bar in this Court and its appearing that the *Motion* having been served upon counsel for Circuit City Stores, Inc., *et al.* (collectively, the “*Debtors*”) and the Office of the Trustee for the Eastern District of Virginia; and after due deliberation and sufficient cause appearing therefore, it is hereby accordingly,

ORDERED, ADJUDGED, & DECREED that, pursuant to the requirements of *Local Bankruptcy Rule* 2090-1(E)(2), Mary E. Olden, Esquire be and is hereby permitted to appear and be heard *pro hac vice* as counsel for CSI Construction Company, as creditor and claimant that is

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represented locally by Sands Anderson Marks & Miller, P.C. in this matter (collectively, the "CSI") in these jointly-administered Chapter 11 bankruptcy cases.

ENTERED ON
DOCKET: / /08

The Honorable Kevin R. Huennekens
United States Bankruptcy Court for Eastern District
of Virginia, Richmond Division

I ask for this:

/s/ Lisa Taylor Hudson
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LOCAL BANKRUPTCY RULE 9022-1 CERTIFICATION

Pursuant to Local Bankruptcy Rule 9022-1 (C), I hereby certify that the foregoing proposed Order has been endorsed by or served upon all necessary parties.

/s/ Lisa Taylor Hudson